1 2 3 4 5 BEFORE THE INSURANCE COMMISSIONER 6 OF THE STATE OF WASHINGTON 7 In the Matter of the Application Docket No. G02-45 Regarding the Conversion and Acquisition of Control of Premera MOTION FOR LEAVE TO INTERVENE Blue Cross and its Affiliates. 10 11 University of Alaska, 12 Applicant for Intervention. 13 14 15 The University of Alaska moves to intervene as an interested party in the above 16 matter, which will determine whether Premera Blue Cross may convert from a non-profit 17 to a for-profit corporation. The University has significant interests that will be affected 18 by the Insurance Commissioner's decision in this matter. 19 The University of Alaska is one of the largest employers in the State of Alaska. 20 The health care claims of its 4000 employees and their dependents have been 21 administered by Premera Blue Cross since 1995. When the University put its health care 22 benefit contract out to bid in 1999, Premera was the only bidder. The University may be 23 Premera's largest Alaska account. Employees contribute to the cost of their health care 24 25 UNIVERSITY OF ALASKA MOTION University of Alaska 26

1

PO Box 5160

Fairbanks, AK 99775

FOR LEAVE TO INTERVENE

UNIVERSITY OF ALASKA MOTION FOR LEAVE TO INTERVENE

University of Alaska PO Box 5160 Fairbanks, AK 99775

benefit, in an amount largely dictated by the claim payments in excess of the University's defined contribution. The University and its employees are concerned about the effect that the conversion will have on availability and rates for its health care benefit, as well as the rates for other state residents.

Premera Blue Cross is Alaska's dominant insurer. It is virtually the only Alaska carrier to write for the small group market, and the majority of its business is in this market. In 2001, Premera controlled more than 95 percent of the state's individual comprehensive medical coverage in the private market.

The University is also concerned about the rationale for allocating the conversion proceeds between the states of Washington and Alaska and the structure of the new foundations. Premera proposes that the funds generated by the new charitable foundations be used solely to promote the health of the residents of the States of Washington and Alaska. The University of Alaska is a statewide institution of higher education, with campuses in several communities of the state. The state has severe shortages in several key health professions and the University plays a dominant role in training and education to address these needs. Thus, the University has an interest in seeing that the conversion proceeds are distributed towards improving the availability of quality, affordable health care and related services and in addressing the unmet personal and public health care needs of Alaskans.

The University's Statewide Health Programs office works with University campuses and Alaska's health community to provide coordination and capacity building in response to the state's most significant health needs. Its academic goals include responding to health needs throughout the state, training Alaskans for health related occupations, and increasing its capacity to answer health related questions of particular

	1	
	2	
	3	
	4	
	5	
	6	
	7	
	8	
	9	
L	0	
L	1	
L	2	
L	3	
L	4	
L	5	
L	6	
L	7	
L	8	
L	9	
2	0	
2	1	
2	2	
		1

importance to Alaska. The University offers health sciences degrees, including a
Master's of Public Health. The University of Alaska Anchorage School of Nursing offers
the only regularly scheduled coursework leading to eligibility for licensure as a
Registered Nurse and for advanced nursing practice in Alaska. Although Alaska does not
have its own medical school, the University of Alaska is affiliated with the University of
Washington School of Medicine WWAMI program, a cooperative agreement between
the University of Washington and the states of Washington, Wyoming, Alaska, Montana
and Idaho, which allows qualified Alaska residents admission to the University of
Washington.

As a statewide institution of higher education with a direct interest in the funding and support of health care initiatives, as well as the cost and availability of health care benefit programs for its employees, the University has substantial interests in the outcome of the proposed conversion. The University seeks intervention to resolve several concerns with respect to the proposed conversion, including but not limited to:

- the effects of a conversion on its covered employees and the Alaska insurance market;
- 2. the impact of the proposed conversion on Alaska's personal and public health system;
- an equitable allocation of proceeds between Alaska and Washington if the conversion is approved;
- 4. the structure of the new foundations and their purposes;
- 5. any conditions or other requirements that OIC should impose to insure that the full value of Premera's assets are transferred to Alaska and Washington foundations and equitably allocated between them.

3

25

23

24

26

UNIVERSITY OF ALASKA MOTION FOR LEAVE TO INTERVENE

University of Alaska PO Box 5160 Fairbanks, AK 99775

1	The University requests that the Insurance Commissioner permit it to intervene in this		
2	matter, to be heard on all issues and to be	accorded all the rights of an interested party	
3	pursuant to law.		
4		Dated this 26 th day of November, 2002.	
5			
6		University of Alaska	
7			
8		By:	
9		Karen Perdue Associate Vice President	
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25	LINING CITY OF ALACKA MOTION	University of Alaska	
26	UNIVERSITY OF ALASKA MOTION FOR LEAVE TO INTERVENE	University of Alaska 4 PO Box 5160 Fairbanks, AK 99775	

1 PROOF OF SERVICE 2 I certify that I served a copy of this document on all parties or their counsel of record on the date below as follows: 3 X U.S. Mail postage prepaid via consolidated mail service 4 Via Facimile followed by legal Messenger Service 5 6 State Campus Delivery 7 Hand delivery by _____ 8 I certify under penalty of perjury under the laws of the State of Alaska that the foregoing is true and correct. 9 10 DATED this _____ day of November, 2002. 11 Barbara Branton 12 Coordinator 13 James T. Odiorne Richard Spoonemore Attorney for Washington Citizen 14 **Deputy Insurance Commissioner** Action. et al. Company Supervision 15 PO Box 40259 Columbia Legal Services 101 Yesler Way, Suite 300 Olympia, WA 98504-0259 16 Seattle, WA 98104 Melanie C. deLeon 17 Assistant Attorney General Eleanor Hamburger Office of the Insurance Commissioner John Midgley 18 PO Box 40100 Attorney for Welfare Rights 19 Olympia, WA 98504-0100 Columbia Legal Services 101 Yesler Way, Suite 300 20 Seattle, WA 98104 Carol S. Arnold Kirk A. Dublin 21 Attorneys for PREMERA Preston Gates & Ellis 22 701 Fifth Avenue, Suite 5000 23 Seattle, WA 98104-7078

5

UNIVERSITY OF ALASKA MOTION FOR LEAVE TO INTERVENE

24

25

26

University of Alaska PO Box 5160 Fairbanks, AK 99775

1	Daniel S. Gross
2	Deborah A. Dorfman
	David Girard Attorneys for WA Protection and
3	Advocacy System, Inc.
4	Columbia Legal Services 101 Yesler Way, Suite 300
5	Seattle, WA 98104
6	Jeff Coopersmith
7	Attorney for WA State Medical Assoc Coopersmith & Associates, Inc.
8	Bank of America Tower
9	701 Fifth Avenue, Suite 4200 Seattle, WA 98104
10	Taya Briley
11	Attorney for Association of WA Public Hospital Districts
12	300 Elliott Avenue West, Suite 300 Seattle, WA 98119
13	
14	Michael Madden Michael S. Shachat
15	Attorney for WA State "Hospital Associations"
16	999 Third Avenue, Suite 2150 Seattle, WA 98104
17	
18	
19	
20	
21	
22	
23	
24	
25	

6

26